



Thomas E. Preston
Chief Executive Officer

September 27, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Attention: Chief – Wireline Competition Bureau

**Re: WC Docket No. 10-90
Connect America Fund Phase I Round 2 Support Challenges**

Dear Ms. Dortch:

Cumberland Cellular, Inc. d/b/a Duo County Telecom (“Duo County Telecom”) hereby files these challenges to Windstream Corporation’s (“Windstream”) request to receive support in the second round of the Connect America Fund Phase I (“CAF Phase I Round 2”) to provide broadband service to locations within the census blocks on the attached list. Duo County Telecom currently provides or can provide within 7-10 days broadband service at or above 3 Mbps download, 768 kbps upload in the census blocks identified on the attached list. Duo County Telecom respectfully requests that the Wireline Competition Bureau take into consideration the evidence provided herein as it makes its final determinations about which census blocks are ultimately eligible to receive CAF Phase I Round 2 support.

On August 28, 2013, the Federal Communications Commission (“FCC”) released a Public Notice (DA 13-1832) which instructed interested parties “to challenge price cap carrier’s Phase I deployment plans by demonstrating that a block in question is already served by fixed Internet access with the requisite speeds.”¹ The Public Notice included a list of all census blocks that the price cap carriers are requesting to receive CAF Phase I Round 2 support to provide broadband service. Duo County Telecom has reviewed this list and identified census blocks that should not be eligible for CAF Phase I Round 2 support.

Duo County Telecom hereby certifies under penalty of perjury that it provides or can provide within 7-10 days broadband service at or above 3 Mbps/768 kbps as a competitive local exchange carrier in the census blocks included in Attachment A. Duo County Telecom can provide supporting evidence such as detailed customer records or invoices to the FCC upon request.

¹ Wireline Competition Bureau Publishes Census Blocks, and Commences Challenge Process, for Second Round of Connect America Fund Phase I WC Docket No. 10-90, Public Notice, DA 13-1832 (rel. August 28, 2013) (“August 28 Public Notice”).

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Sincerely,

A handwritten signature in blue ink, appearing to read 'T. E. Preston', with a long horizontal flourish extending to the right.

Thomas E. Preston
Chief Executive Officer

cc: Ryan Yates, Wireline Competition Bureau, Telecommunications Access Policy Division

Attachments

ATTACHMENT A

The following census blocks are identified in the August 28, 2013 Public Notice as census blocks that Windstream is requesting CAF Phase I Round 2 support for the deployment of broadband service, which Duo County Telecom challenges and urges the FCC to determine that these census blocks are ineligible for CAF Phase I Round 2 support as Duo County Telecom operates as a competitive local exchange carrier in these census blocks and provides or can provide broadband service at or above 3 Mbps/768 kbps.

210019702001009	210019704013015
210019702001043	210019704013016
210019702001044	210019704013018
210019702001046	210019704013019
210019702001071	210019704013020
210019702001074	210019704013021
210019702001076	210019704013028
210019702001087	210019704021000
210019702001099	210019704021005
210019703001016	210019704021006
210019703001021	210019704021008
210019703001027	210019704021009
210019703001028	210019704021030
210019703001030	210019704021031
210019703002006	210019704021033
210019703002016	210019704021034
210019703002025	210019704021040
210019703002028	210019704021044
210019703003011	210019704021046
210019703003036	210019704021052
210019704011000	210019704021058
210019704011001	210019704021059
210019704011002	210019704021061
210019704011032	210019704021064
210019704011033	210019704021068
210019704013002	210019704023000
210019704013011	210019704023002
210019704013012	210019706001010
210019704013013	